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9 *Attorneys for Defendant Prestige Travel, Inc.*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 EMILY HALL, an individual,

13 Plaintiff,

14 vs.

15 PRESTIGE TRAVEL & CRUISES, a
corporation licensed to do business in Nevada;
16 DOES-IX, inclusive, and ROE ENTITIES I-X,
inclusive,

17 Defendant.
18

Case No. 2:20-cv-00772

**DECLARATION OF
JASON D. GUINASSO IN SUPPORT OF
PRESTIGE'S MOTION FOR
SUMMARY JUDGMENT**

19 I, Jason D. Guinasso, declare:

20 1. I am an attorney duly licensed to practice law in Nevada. I am an attorney of
21 record for Defendant Prestige Travel & Cruises ("Prestige") in this action. I submit this
22 declaration in support of Prestige's Motion for Summary Judgment. I have personal knowledge
23 of the facts stated herein and could testify competently thereto if called to do so.

24 2. **Exhibit 1** is a true copy of Emily Hall Depo Tr. at 40:9-14 dated March 3, 2021.

1 3. **Exhibit 2** is a true copy of Standard Operating Procedures, Attendance, Vacation
2 Requests, Payroll & Timeclock at EMILY HALL 00011-EMILY HALL 00015.

3 4. **Exhibit 3** is a true copy of Standard Operating Procedure Acknowledgment re:
4 Attendance Policy at PT0022.

5 5. **Exhibit 4** is a true copy of Standard Operating Procedure, Attendance, Schedule,
6 Payroll & Timeclock; including Emily Hall's Acknowledgment at PT0038-42.

7 6. **Exhibit 5** is a true copy of Emily Hall Depo Tr. at 47:10-19 dated March 3, 2021.

8 7. **Exhibit 6** is a true copy of Emily Hall Depo Tr. at 57:23 – 58:2, 5 dated March 3,
9 2021.

10 8. **Exhibit 7** is a true copy of Emily Hall Depo Tr. at 63:1-9, dated March 3, 2021.

11 9. **Exhibit 8** is a true copy of Job Description from Prestige Travel, Inc. Cruise Call
12 Center re: Customer Service Supervisor at PT0134-135.

13 10. **Exhibit 9** is a true copy of Emily Hall Depo Tr. at 63:12-15 dated March 3, 2021.

14 11. **Exhibit 10** is a true copy of Emily Hall Depo Tr. at 71:19 – 73:19 dated March 3,
15 2021.

16 12. **Exhibit 11** is a true copy of Emily Hall Depo Tr. at 70:10 – 71:10, 73:18 – 76:3
17 dated March 3, 2021.

18 13. **Exhibit 12** is a true copy of Emily Hall Depo. at 103:8-16 dated March 3, 2021.

19 14. **Exhibit 13** is a true copy of Letter from Candice Garcia, MA, CCRP, Site
20 Manager with CRC Clinical Research Consortium re: notice to allow E. Hall to snack
21 or consume meals when needed due to her medical condition dated December 14,
22 2018 at PT0043.

23 15. **Exhibit 14** is a true copy of Emily Hall Depo Tr. at 103:14-16 dated March 3,
24 2021.

1 16. **Exhibit 15** is a true copy of Plaintiff Objections and Responses to Defendant's
2 Requests for Admission No. 14 at p. 8.

3 17. **Exhibit 16** is a true copy of Emily Hall Depo Tr. at 93:3-5, 98:19-24, 99:5-13
4 dated March 3, 2021.

5 18. **Exhibit 17** is a true copy of May 18, 2018 Clinical Research Consortium Excuse
6 Note, produced as part of Plaintiff's Response to RFP No. 29.

7 19. **Exhibit 18** is a true copy of Work/School Excuse Airline Acknowledgement from
8 Dignity Health St. Rose Dominican hospital re: Emily Hall's treatment and discharge at PT0044.

9 20. **Exhibit 19** is a true copy of Emily Hall Depo Tr. at 106:9-17 dated March 3, 2021.

10 21. **Exhibit 20** is a true copy of Emily Hall Time Card Detail at PT0086.

11 22. **Exhibit 21** is a true copy of Emily Hall Depo Tr. at 126:3-8 dated March 3, 2021.

12 23. **Exhibit 22** is a true copy of Plaintiff Objections and Responses to Defendant's
13 Requests for Admission No. 4 at p. 4.

14 24. **Exhibit 23** is a true copy of E-mail from Tani Hali (Emily Hall) to K. Kristin
15 Hagan re: notice of specialist appointment scheduled for March 8, 2020 at PT0055.

16 25. **Exhibit 24** is a true copy of Emily Hall Depo Tr. at 127:4-6 dated March 3, 2021.

17 26. **Exhibit 25** is a true copy of Written Warning from Kari Pioquinto, Supervisor
18 with Prestige Travel & Cruises to Tani Hall, Employee re: 8.5 attendance points reached (signed
19 by Employee and Supervisor) at PT0027.

20 27. **Exhibit 26** is a true copy of Emily Hall Time Card Detail at PT0090.

21 28. **Exhibit 27** is a true copy of Emily Hall Depo Tr. at 79:1-11, 81:3-7, 83:6, 83:14-
22 18, 83:24 – 84:7 dated March 3, 2021.

23 29. **Exhibit 28** is a true copy of Emily Hall Depo Tr. at 86:4-11 dated March 3, 2021.

24 ///

1 30. **Exhibit 29** is a true copy of Emily Hall Depo Tr. at 112:3-20, 130:10-12 dated
2 March 3, 2021.

3 31. **Exhibit 30** is a true copy of Emily Hall Depo Tr. at 115:1-6 dated March 3, 2021.

4 32. **Exhibit 31** is a true copy of Evelyn Hall Depo Tr. at 14:25 – 18:25 dated March
5 9, 2021.

6 33. **Exhibit 32** is a true copy of Emily Hall Depo Tr. at Emily Hall Depo Tr. at 162:23
7 – 163:2, 10-12 dated March 3, 2021.

8 34. **Exhibit 33** is a true copy of Emily Hall Depo Tr. at 110:3-15 dated March 3, 2021.

9 35. **Exhibit 34** is a true copy of Emily Hall Depo Tr. at 183:17-21 dated March 3,
10 2021.

11 36. **Exhibit 35** is a true copy of Emily Hall Depo Tr. at 133:3-13 dated March 3, 2021.

12 37. **Exhibit 36** is a true copy of Emily Hall Depo Tr. at 131:3-20 dated March 3, 2021.

13 38. **Exhibit 37** is a true copy of Emily Hall Depo Tr. at 31:6-10, 211:3-13 dated March
14 3, 2021.

15 39. **Exhibit 38** is a true copy of E-mail from Emily Hall to K. Hagan re: release for
16 part time 4 days a week, 6 hours a day; attached Doctor Note from Syed T. All, M.D., from
17 Neurology Institute of Nevada dated April 17, 2019 at PT0064-PT0065.

18 40. **Exhibit 39** is a true copy of Emily Hall Depo Tr. at 145:1-2 dated March 3, 2021.

19 41. **Exhibit 40** is a true copy of Emily Hall Depo Tr. at 164:1-4 dated March 3, 2021.

20 42. **Exhibit 41** is a true copy of Response to Charge of Discrimination from Kristin
21 Hagan, HR, Manager, Prestige Travel, Inc. submitted to Equal Opportunity Commission re:
22 EEOC Charge No. 487-2019-01407 at PT0122-PT0123.

23 43. **Exhibit 42** is a true copy of Emily Hall Depo Tr. at 148:18 – 149:4 dated March
24 3, 2021.

1 44. **Exhibit 43** is a true copy of Emily Hall Depo Tr. at 212:7-11 dated March 3, 2021.

2 45. **Exhibit 44** is a true copy of E-mail from K. Hagan to E. Hall re: Notification of
3 termination due to absences as of April 18, 2018 at PT0066.

4 46. **Exhibit 45** is a true copy of Plaintiff's Interrogatory Response No. 17.

5 47. **Exhibit 46** is a true copy of Emily Hall Depo Tr. at 159:24-25 dated March 3,
6 2021.

7 48. **Exhibit 47** is a true copy of Plaintiff's Interrogatory Response No. 11.

8 49. **Exhibit 48** is a true copy of Emily Hall Depo Tr. at 100:20 – 101:11 dated March
9 3, 2021.

10 50. **Exhibit 49** is a true copy of Emily Hall Depo Tr. at 143:2-15 dated March 3, 2021.

11 51. **Exhibit 50** is a true copy of Emily Hall Depo Tr. at 135:18-21 dated March 3,
12 2021.

13 52. **Exhibit 51** is a true copy of Emily Hall Depo Tr. at 138:21-25 dated March 3,
14 2021.

15 53. **Exhibit 52** is a true copy of Text Messages between Plaintiff and Kari Piquinto,
16 provided as part of Plaintiffs Response to RFP No. 29.

17 54. **Exhibit 53** is a true copy of Text Messages between Plaintiff and Heidi Rutter,
18 provided as part of Plaintiffs Response to RFP No. 29.

19 55. **Exhibit 54** is a true copy of Investigator's interview of Kristin Hagan at EMILY
20 HALL 00054-EMILY HALL 00056, at 55-56.

21 56. **Exhibit 55** is a true copy of Job Description from Prestige Travel, Inc. Cruise Call
22 Center re: Customer Service Supervisor PT0134-PT0136.

23 Executed on this 8th day of April, 2021

/s/ Jason D. Guinasso

24 Jason D. Guinasso

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of Hutchison & Steffen, PLLC, over the age of 21 years, and not a party to nor interested in the within action. I certify that on this date, April 8, 2021, the foregoing was electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

Floyd Travis Buchanan
F. Travis Buchanan, ESQ., & Assoc., PLLC
Email: Travis@ftblawlv.com
Attorney for Plaintiff

/s/ Bernadette Francis
Employee of Hutchison & Steffen, PLLC